



Affiliated With American Agri-Women

ILLINOIS AGRI-WOMEN

We've A Story To Tell

ELEANOR ZIMMERLEIN

Legislative Chairman

1518 Baseline Road

LaMoille, IL 61330

815-638-2050

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Mississippi River/Gulf of Mexico Action Plan (4503F)
c/o U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Re: Comments on the Draft Action Plan for Reducing, Mitigating, and Controlling Hypoxia in the Northern Gulf of Mexico.

Illinois Agri-Women is an organization of farm and agri-business women promoting a better understanding of agriculture and the family farm system.

We oppose adoption of the Action Plan in its current form because under some of the proposed solutions:

- * millions of acres of prime farmland in Illinois would be converted to wetlands or riparian acres,
- * levee districts would be flooded,
- * the viability of Illinois agriculture would be threatened, and
- * cities and towns would face severe economic hardships to upgrade sewage treatment plants.
- * The chief executive officer of the state has not endorsed this plan. Gov. Ryan (IL) objects to the provision for numeric standards of plant nutrient application (to farmland) as a means to reduce the Gulf's hypoxia problem
- * The Integrated Assessment fails to establish a scientific basis or demonstrate a direct amount of improvement in Gulf quality to a measured reduction in plant nutrient application.

We oppose adoption because the economic analyses:

- * have failed to identify any measurable negative effects on the fisheries of the Gulf,
- * have inadequately assessed the impacts on Midwestern agriculture, and
- * have not even considered the social costs of lost production and lost jobs.

Goal 1.B—to reduce the extent of Gulf of Mexico hypoxia to less than 5000 square kilometers by the year 2010. In the year 2000, the hypoxic zone only covered approximately 1700 square miles, a reduction of 78% from the previous year. This is not what your science says would happen. It is time to stop right now, and redo your science before you make and enforce any more rules.

Further language revision should include "The state and tribes, when authorized pursuant to their laws and appropriately funded by the U.S. EPA, will..."

Sincerely

Eleanor Zimmerlein